

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORP.,

Plaintiff,

v.

DELL, INC.; GATEWAY, INC.; HEWLETT-PACKARD CO.;
ACER INC.; ACER AMERICA CORP.; AOC INTERNATIONAL;
ENVISION PERIPHERALS, INC.; TPV TECHNOLOGY, LTD.;
TPV INTERNATIONAL (USA), INC.; AU OPTRONICS CORP.;
AU OPTRONICS CORPORATION AMERICA
a/k/a AU OPTRONICS AMERICA, INC.; BENQ CORP.;
BENQ AMERICA CORP.; CHUNGHWA PICTURE TUBES, LTD.
a/k/a CHUNGHWA PICTURE TUBES CO.;
TATUNG CO.; TATUNG CO. OF AMERICA, INC.;
BOE HYDIS TECHNOLOGY CO., LTD.;
BOE HYDIS AMERICA INC.; CHI MEI OPTOELECTRONICS;
COMPAL ELECTRONICS, INC.; HANNSTAR DISPLAY CORP.;
JEAN CO., LTD.; LITE-ON TECHNOLOGY CORP.;
LITE-ON, INC. a/k/a LITEON TRADING USA, INC.;
MAG TECHNOLOGY CO., LTD.;
MAG TECHNOLOGY USA, INC.;
PROVIEW INTERNATIONAL HOLDINGS, LTD.;
PROVIEW TECHNOLOGY, INC.;
PROVIEW ELECTRONICS CO., LTD.; and
QUANTA DISPLAY, INC.

Defendants.

Case No.: 05-27-SLR

Jury Trial Demanded

**GUARDIAN’S REPLY TO LITE-ON TECHNOLOGY CORPORATION
AND LITE-ON, INC.’S COUNTERCLAIMS**

Guardian Industries Corp. (“Guardian”) replies to Lite-On Technology Corporation’s and Lite-On, Inc.’s (collectively, “Lite-On”) counterclaims as follows:

REPLY TO COUNTERCLAIMS

116. Admitted.

117. Admitted.

118. Admitted.

119. Guardian admits that Lite-On's counterclaims include claims for declaratory judgment of non-infringement and invalidity and that this Court has jurisdiction over the subject matter of these particular counterclaims, but denies that the counterclaims have any merit and denies that Lite-On is entitled to any of the relief sought in their counterclaims or Prayer. Guardian denies any and all remaining averments in Paragraph 119 of Lite-On's counterclaim.

120. Admitted.

121. Guardian admits that venue is proper in this Court.

122. Guardian repeats and incorporates by reference its responses to paragraphs 116-121.

123. Guardian admits that there exists an actual controversy between Guardian and Lite-On concerning infringement of the '214, '187, '065 and '588 patents. Guardian denies any and all remaining averments in Paragraph 123 of Lite-On's counterclaims.

124. Denied.

125. Denied.

126. Guardian repeats and incorporates by reference its responses to paragraphs 116-121.

127. Denied.

128. Denied.

129. Denied.

130. Paragraph 130 of Lite-On's filing contains no allegation that necessitates any admission or denial from Guardian.

WHEREFORE Guardian respectfully submits that Lite-On's counterclaims should be dismissed, with costs assessed against Lite-On, and seeks such further relief as the Court deems appropriate.

* * * * *

Dated: May 23, 2005

/s/ Richard K. Herrmann
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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of May, 2005, I electronically filed the foregoing document, **GUARDIAN'S REPLY TO LITE-ON TECHNOLOGY CORPORATION AND LITE-ON, INC.'S COUNTERCLAIMS**, with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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Additionally, I hereby certify that on the 23rd day of May, 2005, the foregoing document was served via email on the following non-registered participants:

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